UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS (EASTERN DIVISION)

Comcast of Georgia/Massachusetts, Inc.) and Comcast of Middletown, Inc. and Comcast of Boston, Inc. and Comcast of California/ Massachusetts/ Michigan/Utah,) and Comcast of Maine/New) Inc. Hampshire, of) Inc. and Comcast Massachusetts I, Inc. and Comcast of) Massachusetts II, Inc. and Comcast of Massachusetts III, Inc. and Comcast of) Massachusetts/New Hampshire/Ohio, Inc. and Comcast of New Hampshire, Inc.

AFFIDAVIT IN SUPPORT OF MOTION TO SEAL CERTAIN EXHIBITS FROM PUBLIC VIEWING

Case No.: **04-cv-10414-RCL**

Plaintiffs.

VS.

Joseph Amaro, Dimas Amaro, and Joseph Amaro and Dimas Amaro, Jointly d.b.a. CABLEJOINT and D's Electronics

Defendants

Now comes the affiant, John M. McLaughlin and states under the pains and penalties of perjury:

- 1. I am presently working on a Motion for Summary Judgment in this action.
- Two of the exhibits that I now intend to file are computer records from the
 Defendants' computers that were seized by the police in a related criminal action
 and the Defendants PayPal records.
- 3. The subject computer records and PayPal records are extremely long. The PayPal record, if put on paper, would be over 800 pages.
- 4. Both the PayPal records and the computer records contain over a thousand home addresses of individuals who are not parties to this action.
- 5. In any event, I would most likely have to file these records on a disc as they would probably be too long for PDF electronic filing.

- 6. To extricate all of the home addresses from the pertinent documents would be extremely time-consuming for me and my staff and it would obliterate large segments of the pertinent documents.
- 7. I have called this date the Defense Attorney to see if he would assent to this Motion, but I have received no return phone call from him. In fact, I have called Defense Counsel on matters generally related to the Summary Judgment on multiple occasions over the past few weeks and I have received no return phone call.

Signed under the pains and penalties of perjury this 24th day of January, 2006.

/s/ John M. McLaughlin John M. McLaughlin Green, Miles, Lipton & Fitz-Gibbon LLP 77 Pleasant Street P.O. Box 210 Northampton, MA 01061-0210 Telephone (413) 586-0865 BBO No. 556328